

BRAIN INJURY RIGHTS GROUP

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December 16, 2022

Via ECF

Hon. Stewart D. Aaron
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States of America, ex rel. Patrick Donohue v. Carranza, et al*
1:20-cv-05396 (GHW)(SDA)

Dear Judge Aaron,

As you may recall, the undersigned represents the Relator, Patrick Donohue, in the above-referenced action. On December 3, 2022, You Honor ordered the Plaintiff-Relator to meet and confer with Niagara Falls Defendants and file an appropriate stipulation of dismissal. [ECF No. 231].

The Plaintiff-Relator has circulated a proposed stipulation between the Parties with regard to the New York State claims. However, the Parties require additional time for counsel for the Niagara Falls Defendants to review with their client. Accordingly, the Plaintiff-Relator respectfully requests a one-week extension for Plaintiff-Relator and Niagara Falls Defendants to submit their stipulation no later than Friday, December 23, 2022.

Plaintiff-Relator thanks the Court for its continued courtesies and attention herein.

Respectfully submitted,

/s/ Ashleigh C. Rousseau
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